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BY ECF

Honorable Lewis A. Kaplan
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: *In re Didi Global Inc. Securities Litigation*, Case No. 1:21-cv-05807-LAK

Dear Judge Kaplan:

Plaintiffs, on behalf of all parties to the above-captioned litigation, write to provide the Court with an update concerning the stipulation and proposed order concerning the protocol for discovery of electronically stored information (the “ESI Protocol”) and stipulation and proposed protective order concerning confidentiality (the “Protective Order”).

On May 3, 2024, the parties filed a proposed Scheduling Order and Rule 26(f) Report which, in relevant part, described how the parties have been actively negotiating the terms of the ESI Protocol and Protective Order. ECF 182, at § 6. The parties had initially intended to file the proposed ESI Protocol and Protective Order with the Court by May 10, 2024 (*id.*, at § 6(d)). However, given the complexity of certain issues raised by the parties in the course of the negotiations, the parties now intend to file the Protective Order by May 17, 2024 and the ESI Protocol by May 31, 2024. *See id.*, at § 12.

Respectfully submitted,

/s/ Laurence Rosen

Laurence Rosen

CC: All counsel of record (by ECF)